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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re:	)	
	)	BK-S-11-25836-LED
SURATVADEE ROUNGPET	)	Chapter 13
	)	Trustee: Kathleen A. Leavitt
	)	
	)	HEARING DATE: May 15, 2014
Debtor.	)	HEARING TIME: 3:00 pm

**MOTION FOR ORDER ALLOWING**  
**DEBTORS TO MODIFY MORTGAGE LOAN**

COMES NOW, Debtor, SURATVADEE ROUNGPET, by and through her attorney of record, Corey B. Beck, Esq. and the Chapter 13 Standing Trustee, Rick A. Yarnall, by and through her attorney of record, Danielle Townsend, Esq., and stipulate that the Court may enter an Order permitting Debtor to Modify her loan with Bank of America, N.A., for the real property located at 1394 October Oak Avenue, Las Vegas, NV 89123-5348 as follows:

That on or about October 6, 2011, the Debtor filed this instant bankruptcy under Title 11 of the United States Bankruptcy Code, Chapter 13.

That the §341 Meeting of Creditors was scheduled for January 31, 2012. The case has not been confirmed.

That the Debtor is requesting this Court to allow him to modify their loan with Bank of America, N.A., for their property located at 1394 October Oak Avenue, Las Vegas, NV 89123-5348 (the "Property"). Debtor has negotiated a loan modification which reduces her payment as well as her principal balance owed and interest rate. Debtor was paying \$3,000.00 to Bank of America, N.A., monthly for her mortgage payments (Loan # 3600), but under the proposed loan modification her new payment is \$2,041.46. Bank of America, N.A., has also lowered her interest rate to 2.000%.

1 *See Exhibit "1" Copy of Proposed Loan Modification Agreement (page 4).*

2 **WHEREFORE, DEBTOR** prays for relief as follows:

- 3 1. That the Debtor is requesting that the loan modification proposed by Bank of
- 4 America, N.A. is approved.
- 5 2. That the Debtor is requesting that this loan modification take effect immediately
- 6 upon approval of the Motion.

7 DATED this 23<sup>rd</sup> day of April, 2014.

8  
9 /s/ COREY B BECK  
10 COREY B. BECK, ESQ.  
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